

1 **LAW OFFICE OF WAYNE A. SILVER**

2 Wayne A. Silver (108135)

3 643 Bair Island Road, Suite 403

4 Redwood City, CA 94063

5 Phone: (650) 282-5970

6 Fax: (650) 282-5980

7 Email: ws@waynesilverlaw.com

8 *Attorney for* SANTA CLARA VALLEY
9 TRANSPORTATION AUTHORITY

10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 **In re:**

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC**
17 **COMPANY,**

18 **Reorganized Debtors.**

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
21 ☒ Affects both Debtors

22 ** All papers shall be filed in the lead case,*
23 *No. 19-30088 (DM)*

Case Nos.: 19-30088-DM

19-30089-DM

Chapter 11

(Lead Case Only - Jointly Administered)

**STATEMENT OF NON-OPPOSITION
AND RESERVATION OF RIGHTS RE:
DEBTOR'S FIFTY-SECOND OMNIBUS
OBJECTION TO CLAIMS (NO
LIABILITY / PASS THROUGH EGI
CLAIMS)**

**CLAIM NO. 79091 – SANTA CLARA
VALLEY TRANSPORTATION
AUTHORITY**

24 **SANTA CLARA VALLEY TRANSPORTATION AUTHORITY** (“VTA”) submits this
25 Statement of Non-Opposition and Reservation of Rights in response to the Reorganized Debtors’
26 Fifty-Second Omnibus Objection to Claims [Doc# 9891] (“52nd Omnibus Objection”), and submits
27 as follows:

28 VTA does not object to disallowance of Claim #79091 under the Electric Generation
Interconnection (“EGI”) program, on the basis of the Reorganized Debtors’ representation in the 52nd
Omnibus Objection that “the Reorganized Debtors have determined that the No Liability /
Passthrough EGI Claims either have been cured as part of executory contract assumption process

Page - 1

Statement of Non-Opposition and Reservation of Rights Re: Debtor’s Fifty-Second Omnibus
Objection to Claims (No Liability / Pass Through EGI Claims)

1 under the Plan or have yet to come due and will be paid in the ordinary course.” The VTA otherwise
2 reserves all rights and remedies regarding their participation in the EGI program.

3
4 Dated: January 25, 2021

/s/ Wayne A. Silver

Wayne A. Silver, attorney for SANTA
CLARA VALLEY TRANSPORTATION
AUTHORITY

1 **CERTIFICATE OF SERVICE**

2 I, Wayne A. Silver, the undersigned, hereby declare:

3 I am the attorney for the SANTA CLARA VALLEY TRANSPORTATION AUTHORITY,
4 with offices at 643 Bair Island Road, Suite 403, Redwood City, CA 94063. On January 25, 2021, I
5 caused to be served true and correct copies of the foregoing document by electronic filing said
6 document with the Clerk of the Court using the CM/ECF system, which will send notification of
7 such filing to the e-mail addresses denoted on the Electronic mail notice list.

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct. Executed on January 25, 2021 at Henderson, Nevada.

10 /s/ Wayne A. Silver

11 Wayne A. Silver
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28